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December 10, 2020

VIA ECF

The Honorable Debra Freeman
Chief Magistrate Judge
United State District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Baliga v. Link Motion Inc. et al.*
Case No.: 1:18-cv-11642-VM-DCF

Dear Judge Freeman:

In accordance with Your Honor's instructions during the December 3, 2020 court conference (see Dkt. No. 195), the parties have conferred and jointly propose the following schedule:

Plaintiff's Motion for Receiver to effectuate conversion of Plaintiff's ADR

Plaintiff to file letter motion: December 14, 2020

Receiver to file response: December 17, 2020

Defendant Shi to file opposition: December 21, 2020

Plaintiff to file reply: December 23, 2020

Plaintiff's Motion for leave to file Third Amended Complaint

Plaintiff to file motion: 14 days after decision on conversion motion

Defendant Shi to file opposition: To be agreed upon between counsel after filing of the motion

Plaintiff to file reply: To be agreed upon between counsel after filing of the motion

The parties agree that all other pending motions (Dkt. Nos. 177 (motion to dismiss Second Amended Complaint), 180 (motion to discharge Receiver), 188 (Receiver's application to call an extraordinary general meeting), and 194 (Receiver's motion to cancel China AI's unpaid shares) will be held in abeyance pending the outcome of the motion to effectuate conversion of Plaintiff's ADRs. The parties agree to meet and confer after the resolution of the motion to convert regarding whether some or all of the pending motions are moot and the parties propose holding another scheduling conference after a decision on the motion to convert.

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Plaintiff does not intend to name Link Motion as a defendant in any direct action in his Third Amended Complaint.

Respectfully submitted,

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